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UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: SHAINICE FRANKLIN) Case No. 19 B 08118
	Debtor) Chapter 13
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

SHAINICE FRANKLIN

DAVID M SIEGEL via Clerk's ECF noticing procedures

10154 S CALUMET AVE CHICAGO, IL 60628

Please take notice that on June 19, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on May 23, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

- 1. On March 22, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
- 2. That the above-captioned plan has not yet been confirmed.
- 3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Attend 341 meeting.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN CHAPTER 13 TRUSTEE 55 E. Monroe Street, Suite 3850 Chicago, IL 60603 (312) 294-5900

/s/ Tom Vaughn